



Florida Department of Transportation

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605 Suwannee Street
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JIM BOXOLD
SECRETARY

October 20, 2016

Gregory G. Nadeau, Administrator
Federal Highway Administration
U.S. Department of Transportation
1200 New Jersey Avenue S.E.
Washington, DC 20590

Carolyn Flowers, Acting Administrator
Federal Transit Administration
U.S. Department of Transportation
1200 New Jersey Avenue S.E.
Washington, DC 20590

Re: Docket No. FHWA-2016-0016

Dear Administrators Nadeau and Flowers:

The Florida Department of Transportation (FDOT) is anxious to further comment on the Notice of Proposed Rulemaking (NPRM) issued by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) in the June 27, 2016 Federal Register and reopened for comment on September 23, 2016. The NPRM titled "Metropolitan Planning Organization Coordination and Planning Area Reform" proposes revisions to transportation planning requirements.

In general, FDOT supports the concept of MPO consolidation when justified. Please note, however, our prior comments and those of other state departments of transportation and metropolitan planning organizations make a compelling case that the rulemaking should be suspended. Further, the leadership of the House Transportation and Infrastructure Committee has expressed concern with the NPRM.

The three areas where FHWA and FTA are seeking specific and detailed comments warrant more than a 30-day comment period if they are to be the basis for issuing a final rule. While we cannot provide specific and detailed figures on the expected costs of implementing the proposed rule in Florida, we are confident they would be substantial and represent new costs that must be borne by states and MPOs.

As we emphasized in our prior comments, states and MPOs can follow the intent of the NPRM on their own. We urge FHWA and FTA to work cooperatively with states and MPOs as they demonstrated so well at our Performance Workshop in Orlando on September 28. Rulemaking that will be costly and disruptive in many areas must be avoided.

FHWA and FTA can practice good governance by suspending the rulemaking consistent with Executive Order 12875. We again urge you to do just that. Please do not hesitate to contact us in regards to any of our comments. Mr. David Lee should be your primary point of contact at (850) 414-4802 or david.lee@dot.state.fl.us. Thank you for your attention to FDOT's response.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Boxold".

Jim Boxold
Secretary

JB/dl